

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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BMG MUSIC d/b/a JAY RECORDS,

Plaintiff,

v.

J7 RECORDS, INC.,

Defendant.

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Civil Action No. 07-cv-6076

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**DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

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**To:** David Donahue  
Fross Zelnick Lehrman & Zissu, P.C.  
866 United Nations Plaza  
New York, NY 10017

*Attorneys for Plaintiff*


**PLEASE TAKE NOTICE** that, pursuant to this Court's individual rules, defendant, J7 Records, Inc., by and through its undersigned attorneys, Troutman Sanders, shall move before the Honorable Miriam Goldman Cedarbaum, U.S.D.J. at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on Thursday, November 8, 2007 at 9:30am, for the entry of an Order dismissing Plaintiff's Complaint for lack of personal jurisdiction, in accordance with Rule 12(b)(2) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, defendant J7 Records, Inc. shall rely upon the accompanying Memorandum of Law and Declaration of Tireka Cobb.

Respectfully submitted,

**TROUTMAN SANDERS LLP**

**Dated:** October 11, 2007  
New York, New York

By:   
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